

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
VICTORIA DIVISION**

IN RE:	§	Case No. 22-60043
	§	
FREE SPEECH SYSTEMS, LLC,	§	Chapter 11 (Subchapter V)
	§	
Debtor.	§	

EXHIBIT J

June 24, 2021

NO. X06-UWY-CV-18-6046436S)	SUPERIOR COURT
)	
ERICA LAFFERTY, ET AL,)	COMPLEX LITIGATION DOCKET
)	
VS.)	AT WATERBURY
)	
ALEX EMRIC JONES, ET AL,)	JUNE 24, 2021
)	
_____)	
)	
NO. X-06- UWY-CV18-6046437-S)	SUPERIOR COURT
)	
WILLIAM SHERLACH,)	COMPLEX LITIGATION DOCKET
)	
VS.)	AT WATERBURY
)	
ALEX EMRIC JONES, ET AL.)	JUNE 24, 2021
)	
_____)	
)	
NO. X06-UWY-CV-18-6046438S)	SUPERIOR COURT
)	
WILLIAM SHERLACH, ET AL.,)	COMPLEX LITIGATION DOCKET
)	
VS.)	AT WATERBURY
)	
ALEX EMRIC JONES, ET AL.)	JUNE 24, 2021

CONFIDENTIAL

ORAL AND VIDEOTAPED DEPOSITION OF
 FREE SPEECH SYSTEMS, LLC
 BY
 MICHAEL ZIMMERMANN
 JUNE 24, 2021

ORAL AND VIDEOTAPED DEPOSITION OF MICHAEL ZIMMERMANN,
 produced as a witness at the instance of the PLAINTIFF, and
 duly sworn, was taken in the above-styled and -numbered cause
 on JUNE 24, 2021, from 9:00 a.m. to 4:10 p.m., before

June 24, 2021

1 Rosalind Dennis, Notary in and for the State of Texas, reported
2 by machine shorthand, appearing remotely from Dallas, Texas,
3 pursuant to the Federal Rules of Civil Procedure and the
4 provisions stated on the record or attached hereto.

June 24, 2021

A P P E A R A N C E S

FOR THE PLAINTIFFS:

CHRISTOPHER M. MATTEI, ESQ.
MATTHEW S. BLUMENTHAL, ESQ.
KOSKOFF KOSKOFF & BIEDER, PC
350 Fairfield Avenue, Suite 501
Bridgeport, Connecticut 06604
Cmattei@koskoff.com
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(203) 336-4421

FOR THE DEFENDANTS:

JAY MARSHALL WOLMAN, ESQ.
RANDAZZA LEGAL GROUP
100 Pearl Street
14th Floor
Hartford, Connecticut 06103
jmw@randazza.com
(702) 420-2001

ALSO PRESENT:

Joel Raguso - Videographer

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1 10-minute break, that'd be --

2 THE WITNESS: Yeah. We can do 10, roll for
3 another hour or so, and then do that.

4 MR. MATTEI: Great. Thank you.

5 THE WITNESS: Okay.

6 THE VIDEOGRAPHER: We are off the record. The
7 time to 16:13 UTC.

8 (Break taken from 11:13 a.m. to 11:25 a.m.)

9 THE INTERPRETER: We are on the record. The
10 time is 16:25 UTC.

11 EXAMINATION

12 BY MR. MATTEI:

13 Q. Mr. Zimmermann, did anybody provide you with any
14 information during the break?

15 A. No.

16 Q. Okay. All right. So, Mr. Zimmermann
17 Free Speech Systems is owned and operated by Alex Jones,
18 correct?

19 A. That's correct.

20 Q. And does he have authority over all Free Speech
21 Systems operations?

22 A. That's correct.

23 Q. Okay. He is the CEO and owner?

24 A. That's correct.

25 Q. And does he have the authority to hire and fire

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1 anybody of his choosing?

2 A. That's correct.

3 Q. And does he have authority to overrule any decision
4 made by a subordinate?

5 A. That's correct.

6 Q. And he has ultimate authority over Free Speech
7 finances?

8 A. That's correct.

9 Q. And he is not accountable to a board of directors or
10 any governing authority, correct?

11 A. Correct.

12 Q. When did Free Speech Systems hire its first employee?

13 A. The company maintains records. I don't have
14 information on that with me today?

15 Q. Can Free Speech Systems approximate the year that it
16 first hired an employee?

17 A. Approximately 2007, 2008.

18 Q. How many people are employed by Free Speech Systems
19 presently?

20 A. Presently, approximately 80.

21 Q. Who within Free Speech Systems reports directly to
22 Alex Jones?

23 A. Would be Blake Roddy for e-commerce. Melinda Flores
24 for, accounting, Michelle Fruge for customer service. Rob Dew
25 as the news director.

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REPORTER'S CERTIFICATION

DEPOSITION OF MICHAEL ZIMMERMANN

JUNE 24, 2021

19 I, Rosalind Dennis, Notary in and for the State of Texas,
 20 hereby certify to the following:

21 That the witness, MICHAEL ZIMMERMANN, was duly sworn by
 22 the officer and that the transcript of the oral deposition is a
 23 true record of the testimony given by the witness;

24 That the original deposition was delivered to Mr. Mattei.

25 That the amount of time used by each party at the

June 24, 2021

1 deposition is as follows:

2 MR. MATTEI05 HOUR(S): 23 MINUTE(S)

3 MR. WOLMAN00 HOUR(S): 26 MINUTE(S)

4 That pursuant to information given to the deposition
5 officer at the time said testimony was taken, the following
6 includes counsel for all parties of record:

7 Mr. Mattei Attorney for the Plaintiff.

8 Mr. Wolman Attorney for the Defendant.

9 I further certify that I am neither counsel for, related
10 to, nor employed by any of the parties or attorneys in the
11 action in which this proceeding was taken, and further that I
12 am not financially or otherwise interested in the outcome of
13 the action.

14 Certified to by me this 12th day of July, 2021.

16 

17 ROSALIND DENNIS

18 Notary in and for the
19 State of Texas

20 Notary: 129704774

21 My Commission Expires: 10/8/2022

22 US LEGAL SUPPORT

23 8144 Walnut Hill Lane

24 Suite 120

25 Dallas, Texas 75231

214-741-6001

214-741-6821 (FAX)

Firm Registration No. 343